

1 ALAN A. DRESSLER, ESQ. (SBN #56916)
2 400 Montgomery St., Suite 200
3 San Francisco, California 94104
4 Tel.: (415) 421-7980
5 Fax: (415) 421-7021
E-mail : alandressler@aol.com

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7 Attorney for Defendant John Keller
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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,) No. CR 12-0061 EMC
15 Plaintiff,)
16 v.) STIPULATION AND [PROPOSED]
17 JOHN KELLER et al.) ORDER TO CONTINUE STATUS/
Defendants.) CHANGE OF PLEA HEARING
AS TO DEFENDANT JOHN KELLER

18 **STIPULATION**

19 The United States of America and defendant JOHN KELLER, by and through their
respective counsel, hereby stipulate and ask the court to find as follows:

20 1. Defendant John Keller is presently set for a status/possible change of plea hearing on
March 19, 2014.

21 2. The parties have been engaged in good faith negotiations and as of March 12, 2014 had
reached an agreement in principal. However, on March 12, 2014 the U.S. Attorney's Office
announced a change of policy regarding a pending guideline amendment which will require that
the plea agreement be modified and then re-submitted for approval.

22 3. Based on the foregoing the parties request that the court vacate the current status date of
2 : 30
23 March 19, 2014 and set a new status/change of plea date of April 23, 2014 at 2:00 p.m.
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1 So stipulated:

2
3 Dated: March 14, 2014

MELINDA HAAG
United States Attorney

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5 _____
/s/ Kevin Barry
KEVIN BARRY
Assistant U.S. Attorney

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7 Dated: March 14, 2014

8 /s/ Alan A. Dressler
ALAN A. DRESSLER
9 Counsel for Defendant
John Keller

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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,) No. CR 12-0061 EMC
15 Plaintiff,)
16 v.) [PROPOSED] ORDER CONTINUING
17 JOHN KELLER et al.,) STATUS/CHANGE OF PLEA HEARING AS
Defendants.) TO DEFENDANT JOHN KELLER
18 _____)

19 GOOD CAUSE APPEARING, and pursuant to the stipulation of the government and
20 defendant John Keller, IT IS HEREBY ORDERED that the status/change of plea hearing date
21 currently scheduled for March 19, 2014 is vacated.

22 IT IS FURTHER ORDERED that a new status/change of plea hearing date is set for April
23 2:30
24 23, 2014 at 2:00 p.m.

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26 **IT IS SO ORDERED.**

27 Dated: 3/17/14

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Stipulation and Proposed Order
CR 12-0061 EMC

